# ORIGINAL

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### SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

#### VIA HAND DELIVERY

Ms. Magalie Roman Salas Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Re:

Application by Verizon New England, Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verzion Enterprise Solutions) and Verizon Global Networks, Inc. for Authorization to Provide In-Region InterLATA Services in Massachusetts, CC Docket No. 01-9, Notice of Ex Parte Meeting Pursuant to Rule 1.1206(b)

Dear Ms. Salas:

On February 23, 2001, Patrick Donovan and the undersigned of Swidler Berlin Shereff Friedman, LLP, together with Lawrence Walke and Stephen Murray of Winstar Communications, Inc., ("Winstar") made an *ex parte* presentation to Ben Childers, Eric Einhorn, Rhonda Lien, Jennifer McKee, Daniel Shiman and Julie Veach of the Common Carrier Bureau in the above-captioned proceeding. Mary Prosser and Richard St. George of Winstar participated via teleconference. The presentation addressed problems Winstar is experiencing in regard to Verizon's provisioning of interconnection trunking. A summary of the presentation is attached.

Sincerely,

Harisha J. Bastiampillai

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#### February 23, 2001 Ex Parte Meeting of Winstar Communications, Inc.

#### **Checklist Item 1 – Interconnection Trunking Issues**

#### Outages/Repair

• Verizon has failed to implement any tangible measures to address the maintenance/repair problems Winstar has documented. Winstar has seen little improvement in Verizon's response to troubles, or general communication or cooperation.

#### **Provisioning**

- Winstar has experienced delays in all stages of the provisioning process from Verizon's delivery of firm order commitments to actual delivery of the trunks.
- Ordering -- Winstar will submit an order, and often wait days, if not weeks, for a response. Winstar will then attempt to ascertain the status of the order, but is often unable to track the status due to problems with Verizon's Open Query List. In addition, Verizon is constantly changing the contact personnel to whom problems should be escalated, and is failing to update CLECs as to whom to contact.
- Firm Order Commitments -- Winstar has experienced delays in receiving firm order commitments ("FOC"). Once the FOC is finally issued, it often provides little or no notice for when the trunk will actually be provisioned. If Winstar fails to meet the appointment with the Verizon technician, the order is classified as "customer not ready." Even when Winstar is able to meet the technician, the order is often incomplete, or not ready at all, due to a purported lack of facilities.
- Trunk Delivery -- Winstar computed the average amount of days it took for Verizon to provision trunks from the date of submission of the access service request to the date the order is ready for service. In Massachusetts, the average period was 97.2 days. Winstar did a comparative analysis of the intervals for other ILECs in regard to provisioning trunks to Winstar and Verizon's performance in Massachusetts was by far the worst.

#### **Two-Way Trunking Arrangements**

• In Massachusetts, Verizon has been denying Winstar's efforts to convert its one-way inbound and outbound trunks in Winstar's tandem groups to two-way trunk groups. Winstar is forced to use one-way incoming and one-way outgoing trunks which is highly inefficient because it requires twice the work to provision. In addition, two-way trunks require fewer ports on a switch. Thus, two-way trunking enables Winstar to save money and facilitates its entry into more markets.

#### **Clear Channel Trunks**

• Winstar is still experiencing problems in obtaining 64 Kbps Clear Channel Trunks at the Cambridge location. Winstar requested a trunk group size of 192DS0s that can be 64 cc capable, but only got 24 DS0s with such capability.

#### **CERTIFICATE OF SERVICE**

I, Harisha Bastiampillai, hereby certify that on February 26, 2001, I caused to be served upon the following individuals the Notice of *Ex Parte* Presentation of Winstar Communications, Inc. in CC Docket 01-9:

Harisha Bastiampillai

#### Via Courier:

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